

CAAAC Spring Updates & Survey Request

Good Morning CAAAC Members –

I hope you have been enjoying the temperamental Montana spring weather as much as we have here at DEQ. When we last emailed in January, we told you a little bit about our plans to reevaluate CAAAC and make our meetings and communication as meaningful as possible for all involved. Today, we want to provide you with a few updates and also ask you to please take a moment to help us with the reevaluation process. We can't do it without you!

CAAAC SURVEY

We are requesting your help in reevaluating the CAAAC process. The link below will take you to a brief survey that is part of our effort to take a step back from the way CAAAC has operated over the last couple of years and assess what's working, what isn't working, and what we can improve. The survey will help us gather and/or update information about you so we can get our mailing list up-to-date and better meet your needs in future meetings and communication. Your feedback will be extremely helpful in this effort.

Please complete the survey by Friday, April 22, 2016:

<https://www.surveymonkey.com/r/CAAAC2016>

Note: if you wish to unsubscribe from future CAAAC correspondence, you may use the survey to let us know.

REGULATORY UPDATES

Future Board of Environmental Review (BER) Actions

- April 8, 2016: Initiate rulemaking to strike the phrase “24-hour average” from the PM_{2.5} significant monitoring concentration (SMC) in 17.8.818(7)(a)(iii). When the department amended the rule, effective October 2014, to address EPA's change of the SMC from 4 µg/m³ over a 24-hour average to 0 µg/m³, the department inadvertently neglected to remove the above phrase, raising concern with EPA. This oversight must be addressed to ensure Montana's ongoing NSR-PSD program primacy and authority. If you have questions or comments on this action, please contact Rebecca Harbage at rharbage@mt.gov or 406-444-1472.
- June 3, 2016: Initiate rulemaking to incorporate by reference the July 1, 2015, version of the Code of Federal Regulations (CFR). This is an annual rulemaking in which the department incorporates by reference the most recent versions of the CFR, United States Code, and other state rules and regulations into the Clean Air Act of Montana. If you have questions or comments on this action, please contact Rebecca Harbage at rharbage@mt.gov or 406-444-1472.

Redesignation Request Status Update

- **Billings SO₂** – On March 7, 2016, the Environmental Protection Agency (EPA) proposed to approve of Montana's maintenance plan for the Billings SO₂ nonattainment area and to redesignate the area to attainment for the 2010 SO₂ primary National Ambient Air Quality Standard (NAAQS). Comments on the proposed rule must be received by EPA on or before April 6, 2016.

You may also have read or heard that on March 18, 2016, EPA proposed a Finding of Failure to Submit a State Implementation Plan for the Billings nonattainment area. We understand that this may cause some confusion and want to let you know that should EPA finalize the proposed redesignation within the 18-month timeframe discussed in the Finding of Failure to Submit, no further submittal will be required and no sanctions will take effect. If you have questions or

comments on this action, please contact Stephen Coe at scoe@mt.gov or 406-782-2689 ext. 209.

Clean Power Plan Update

- On February 9, 2016, the U.S. Supreme Court stayed implementation of the Clean Power Plan pending judicial review. In Montana, this means that the work of the Interim Advisory Council is on hold. The Legislature's 111(d) Subcommittee also suspended its work until a decision is made by the courts. If you have questions or comments on this action, please contact Dave Klemp at dklemp@mt.gov or 406-444-0286.

AIR QUALITY BUREAU NEWS

In addition to updates on regulatory actions, we have a few staffing updates to share with you. As part of our changing approach to CAAAC, please welcome **Hoby Rash** as your new DEQ staff contact. As many of you know, Hoby is our Permitting and Compliance Assistance Program Manager and has been closely involved in CAAAC for many years. He is now stepping in to help guide future interaction. You can reach Hoby using the contact information provided at the end of this email.

Another face you will be seeing more of is **Liz Ulrich**. Previously a Planner with the Air Quality Bureau, Liz has stepped into Eric Merchant's shoes as the new Supervisor of the Analysis and Planning Services Section. Welcome Liz!

DEQ is going through some organizational changes to help make the agency more effective and efficient. We understand that in addition to your work with the Air Quality Bureau, many of you work with other programs within DEQ. To help you navigate the changes, here is a quick snapshot of the new Division names and the organization of Bureaus within them:

- The Division formerly known as Planning, Prevention, & Assistance will now be the **Water Quality Division**. It includes the Public Water and Subdivisions Bureau, Technical & Financial Assistance Bureau, Water Protection Bureau, and the Water Quality Planning Bureau.
- The Division formerly known as the Permitting and Compliance Division will now be the **Air, Energy, & Mining Division**. It includes the Air Quality, Energy, Hard Rock Mining, and the Coal & Opencut Mining Bureaus.
- The Division formerly known as Remediation will now be the **Waste Management & Remediation Division**. It includes the Abandoned Mines Program, Contaminated Site Clean-up Bureau, Federal Superfund & Construction Bureau, and the Waste and Underground Tank Management Bureau.
- The new **Centralized Services Division** will include the Financial Services, Human Resources, and Information Technology Bureaus.
- The **Enforcement Division** remains the same.

In closing, we are very excited to revamp CAAAC this year and hope you are, too. We are planning to hold a "kick-off" meeting in mid- to late-May, likely in Helena. Please stay tuned for more information about logistics for that meeting.

You may contact Hoby, as indicated below, if you have any questions, concerns, or suggestions. As a reminder, if you wish to reply to this email, please do not hit "REPLY" as that will send your response to the entire CAAAC mailing list. Instead, send your response directly to Hoby at hrash@mt.gov or call him at 406-444-0055.